

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

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| Carolina Auto Remarketing Services, LLC |) | |
| and Douglas Camburn, |) | |
| |) | C.A. No: 2:17-cv-00858-BHH |
| Plaintiffs, |) | |
| |) | UNIVERSAL UNDERWRITERS |
| vs. |) | INSURANCE COMPANY'S MOTION |
| |) | FOR SUMMARY JUDGMENT |
| Universal Underwriters Insurance Company, |) | |
| |) | |
| Defendant. |) | |

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, the defendant, Universal Underwriters Insurance Company (hereinafter referred to as "Universal Underwriters"), by and through its undersigned counsel, respectfully moves the Court for an order granting judgment, as a matter of law, in favor of Universal Underwriters. This motion is based upon the following grounds and is supported by the accompanying Memorandum in Support of Motion for Summary Judgment filed contemporaneously herewith:

1. There is no genuine issue as to any material fact;
2. Universal Underwriters is entitled to summary judgment as to the plaintiffs' claim for breach of contract because Universal Underwriters fulfilled its obligations under the insurance policy;
3. Universal Underwriters is entitled to summary judgment as to the plaintiffs' claim for bad faith because Universal Underwriters acted reasonably and its position was based on the clear and unambiguous policy language and the facts presented by the insureds.

This motion is made pursuant to Rule 56 of the Federal Rules of Civil Procedure and is based upon the pleadings filed in this case, deposition testimony, affidavits filed or to be filed,

the terms and conditions of the policy of insurance at issue, Universal Underwriters' Memorandum in Support of Motion for Summary Judgment, and the common and statutory law of the State of South Carolina.

Respectfully submitted,

/s/ Jennifer E. Johnsen

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